

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LEAH MIRABELLA, on behalf of herself and
all others similarly situated,

Plaintiff,

v.

RUE LA LA, INC. and KYNETIC LLC,

Defendants.

C.A. No. 1:13-cv-11392-GAO

**NOTICE OF SETTLEMENT AND
JOINT MOTION FOR EXTENSION**

The parties have executed a term sheet memorializing a settlement that resolves all claims asserted in the Complaint on a class-action basis. To give the parties additional time to prepare and file settlement-related documents, including a motion for preliminary approval, the parties hereby respectfully request that this Court enter an order relieving Defendants from their obligation to answer or otherwise respond to the Complaint. In support of this joint motion, the parties hereby state as follows:

1. Defendants' deadline to answer or otherwise respond to the Complaint is currently January 31, 2014.
2. The parties have executed a term sheet memorializing a settlement that resolves all claims asserted in the Complaint on a class-action basis. The parties are in the process of preparing a more comprehensive written settlement agreement, a motion asking this Court to preliminarily approve the settlement, and other settlement-related documents. The parties anticipate that a preliminary approval motion will be filed on or before March 17, 2014.
3. To give the parties time to prepare settlement-related documents, the parties jointly request that this Court relieve Defendants of their obligation to answer or otherwise

respond to the Complaint on January 31, 2014. Because the settlement will resolve all claims asserted in this action, relieving Defendants from the obligation of responding to the Complaint will serve the interests of efficiency and judicial economy.

4. This joint motion is made in good faith and not for purposes of delay or any other improper purpose.

WHEREFORE, the parties respectfully ask this Court to relieve Defendants from their obligation of responding to the Complaint, so that they may have time to prepare and submit settlement papers to the Court.

Dated: January 31, 2014.

Respectfully Submitted,

/s/ Michael M. Maya

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CERTIFICATE OF SERVICE

I hereby certify that, on January 31, 2014, a copy of the foregoing Notice of Settlement and Joint Motion for Extension was filed electronically using the Court's Electronic Case Filing ("ECF") system.

/s/ Michael M. Maya

Michael M. Maya